DECLARATION OF SRILAKSHMI POTHANA ISO GOOGLE LLC'S MOTION FOR RELIEF RE PRESERVATION

Redacted Version of Document Sought to be Sealed

1   **UNITED STATES DISTRICT COURT**

2   **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

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4   CHASOM BROWN, et al., on behalf of
     themselves and all others similarly situated,

5   Plaintiffs,   Case No. 4:20-cv-03664-YGR-SVK

6   vs.

7   GOOGLE LLC,

8   Defendant.

9   PATRICK CALHOUN, et al., on behalf of
     themselves and all others similarly situated,

10

11   Plaintiffs,   Case No. 4:20-cv-05146-YGR-SVK

12   vs.

13   GOOGLE LLC,

14   Defendant.

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16   **DECLARATION OF SRILAKSHMI POTHANA**

17   1.   I am a Software Engineer employed by Google LLC. I have been employed at Google

18   since 2008, and I have been a member of the Google Analytics team since 2012. As part of my

19   duties, I am familiar with the identifiers used in relation to Google Analytics and tables used for the

20   purpose of mapping or linking those identifiers. I make this declaration based on personal

21   knowledge and information provided to me by Google colleagues, and if called to testify, I could

22   and would competently testify to such facts.

23   2.   I understand the Court issued preservation orders in the above-captioned cases,

24   requiring Google to preserve "all mapping and linking tables."

25   3.   My colleagues on the Google Analytics team worked to identify tables that contain

26   a mapping or linking of user or device identifiers that may be included in data received by Google

27   Analytics when users visit Google Analytics customer websites, and we have identified and are

28   working on preserving ■ tables.

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;   POTHANA DECLARATION

1   4.   The combined current size of ▇▇ of the identified tables (excluding the ▇▇ tables

2 identified below) is over ▇▇▇▇▇▇. In order to preserve the mappings of identifiers, we would

3 need to take a snapshot every 25 days, which would require storage of more than ▇▇▇▇▇▇

4 ▇▇▇▇▇▇▇▇▇ per year.

5   5.   Among the tables the Google Analytics team has identified, there are ▇▇ tables

6 called ▇▇▇▇▇ and ▇▇▇▇▇▇▇▇▇▇ that contain a much larger amount

7 of data—over ▇▇▇▇▇ for ▇▇▇▇ and over ▇▇▇▇▇ for ▇▇▇▇▇. These tables

8 contain mappings between Google Analytics User ID (UID) or client ID (CID) and Biscotti where

9 relevant consents were present. They also contain mappings between UID or CID and device ID

10 received from App events. Google Analytics does not receive device IDs when users visit Google
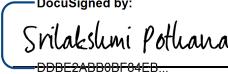
11 Analytics customer websites.

12   6.   The mappings between UID/CID and Biscotti contained in the ▇▇▇▇ and

13 ▇▇▇▇▇ tables come from data stored in Google Analytics logs sources, including:

14 ▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇ and ▇▇▇▇▇▇▇

15 ▇▇▇▇▇▇▇▇▇▇, which I understand are subject to a sample preservation

16 requirement in the *Brown* case. Because the mappings between UID/CID and Biscotti contained in

17 ▇▇▇ and ▇▇▇▇ are sourced from these logs, the logs themselves contain the same

18 mapping information. In other words, for a given sampled entry in the above-identified Analytics

19 logs, any mapping of UID/CID and Biscotti will be self-contained within the sampled data.

20   7.   The identifier mappings in these ▇▇ tables are maintained for ▇▇▇▇▇ in the

21 ordinary course of business. In order to preserve the identifier mappings in these tables, we would

22 need to perform a snapshot every 25 days, which would require storage of more than ▇▇▇▇▇

23 ▇▇▇▇▇▇ per year. I estimate that preservation would take ▇▇▇▇ of engineering

24 hours.

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26   I declare under penalty of perjury that the foregoing is true and correct.

27   Executed on the 25th day of October 2022 at Mountain View, California.

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By: Srilakshmi Pothana

2   Srilakshmi Pothana

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